

SPANISH FLAT WATER DISTRICT

BOARD MEMBERS

Paul Roussopoulos, President
Wesley Plunkett, Director
Scott Young, Director
Mark Fairbanks, Director
Al Colon, Managing Director

July 1, 2006

Mr. Guy Childs
Waste Discharge to Land Unit
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

COPIED - 5 PM 6:00
CORRECTION
CVRWCCO

Re: Monitoring and Reporting Program No. 93-236

Dear Mr. Childs,

Spanish Flat Water District would like to name Richard Thomasser, P.E. as our California Registered Professional as required by the Third Revision of Monitoring and Reporting Program No. 93-236.

However, we must take exception to the groundwater-monitoring requirement. We are not opposed to monitoring our treated wastewater discharge and we are complying with the other elements of the MRP, but we do not believe that the groundwater-monitoring requirement is appropriate, nor would it be effective in our case.

Section 13267 of the California Water Code states in part:

"The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits obtained from the report."

- As we have previously discussed with staff, our treatment plant provides secondary treatment, good enough to be used for irrigation.
- The pond provides no treatment, it is simply a storage/evaporation pond and is already clay lined. Certainly there is some percolation but the water quality in the pond is good and will not cause groundwater contamination.
- The pond is already tested per the current MRP. Our samples taken during the breach caused by the March storms show that the storage pond water is actually cleaner than the water in Lake Berryessa.
- We do not use groundwater in our water system but surface water from Lake Berryessa. There are no active wells used as water supply within Spanish Flat Water District. We are in the final stages of installing 2 new water treatment plants to insure our water quality meets state standards.

ATTACHMENT D TO STAFF REPORT
Spanish Flat Water District, 1 July 2006 Letter

It is our understanding that your staff is concerned that percolation from the pond may leach into the soil that could end up in the ground water. If this happens, we are not clear on what we might be required to do about it or if it's even an impact to the groundwater. Perhaps a periodical site inspection to ensure we are using the best possible practices would be more effective.

Your requirement to install monitoring wells and the associated testing and reports will increase our costs substantially, with no clear benefit to our customers or anyone else. Our mission is to provide quality water and sewer service to our customers at the lowest possible cost. We also believe that our wastewater operations do not cause a soils nor groundwater impact based on the results of water samples from the pond over many years.

If you have any questions, please feel free to contact Wesley Plunkett, our designate representative for the District.

Sincerely,

Paul Roussopoulos
President

A handwritten signature in black ink, appearing to read 'Paul Roussopoulos', with a long horizontal flourish extending to the right.

cc: Wes Plunkett
Rick Thomasser